

REMARKS

The Office Action dated May 29, 2008 has been received and carefully noted. The above amendments to the claims, and the following remarks, are submitted as a full and complete response thereto.

Claims 7-10, 21, 31, and 35 have been amended to more particularly point out and distinctly claim the subject matter of the invention. New claims 73 and 74 have been added. Claims 13, 19, 22-23, 26-27, 30, 36, and 38-46 were previously cancelled. No new matter has been added and no new issues are raised which require further consideration or search. Therefore, claims 1-12, 14-18, 20-21, 24-25, 28-29, 31-35, 37, and 47-74 are currently pending in the application and are respectfully submitted for consideration.

The Office Action rejected claims 1-2, 4-5, 7-12, 14-18, 20-21, 24-25, 28-29, 32-35, 37, and 47-72 under 35 U.S.C. § 102(e) as allegedly being anticipated by Pincus et al. (U.S. Publication No. 2005/0075957) ("Pincus"). The rejection is respectfully traversed for at least the following reasons

Claim 1, upon which claims 2-12, 14-18, and 20 are dependent, recites an apparatus, which includes a requesting unit configured to request that in a first entity, including an information store configured to store information defining an amount of money for at least one user device, a portion of said amount of money be reserved at the first entity, as a reserved portion. The apparatus further includes a controller configured to control an allocation of said reserved portion between a plurality of services to be

accessed by said at least one user device in a session. The allocation is controlled after the request is made, and wherein the apparatus is separate from said first entity, and said at least one user device.

Claim 21, upon which claims 24-25, 28-29, and 31-34 are dependent, recites an apparatus, which includes a requesting unit configured to request reservation of a portion of an amount of money defined by information stored at a first entity. The apparatus further includes a controller configured to control an allocation of a reserved portion between a plurality of services to be accessed simultaneously by a user device. The apparatus further includes a receiver configured to receive from said first entity information defining an amount of said reserved portion in a first form other than a monetary amount. The apparatus further includes a converter configured to convert information relating to said amount of said reserved portion to a second form as a monetary amount.

Claim 35, upon which claims 47-66 are dependent, recites a method, which includes requesting a first entity, the first entity storing information defining an amount of money for at least one user device, for a portion of said amount of money to be reserved as a reserved portion at the first entity, at a controller separate from said first entity and at least one user device. The method further includes controlling at said controller an allocation of said reserved portion between a plurality of services to be accessed in a session after the requesting to the first entity.

Claim 37, upon which claims 67-70 are dependent, recites a method, which includes requesting a reservation of a portion of an amount of money defined for at least one user device by stored information. The method further includes receiving, at a controller configured to allocate a reserved portion between a plurality of services to be accessed simultaneously, information defining an amount of said reserved portion in a first form other than a monetary amount. The method further includes converting information relating to said amount of said portion to a second form as a monetary amount, and then allocating said reserved portion between said plurality of services.

Claim 71 recites an apparatus, which includes means for requesting that in a first entity including an information store configured to store information defining an amount of money for at least one user device, a portion of said amount of money to be reserved at the first entity, as a reserved portion. The apparatus further includes means for controlling an allocation of said reserved portion between a plurality of services to be accessed by said at least one user device in a session. The allocation is controlled after the request is made, and wherein the controller is separate to said first entity and said at least one user device.

Claim 72 recites an apparatus, which includes means for requesting reservation of a portion of an amount of an amount of money defined by information stored at a first entity. The apparatus further includes means for controlling an allocation of a reserved portion between a plurality of services to be accessed simultaneously by a user device. The apparatus further includes means for receiving from said first entity information

defining an amount of said reserved portion in a first form other than a monetary amount. The apparatus further includes means for converting information relating to said amount of said reserved portion to a second form as a monetary amount.

Claim 73 recites a computer program, embodied on a computer-readable medium, for controlling a processor to implement a method. The method includes requesting a first entity, the first entity storing information defining an amount of money for at least one user device, for a portion of said amount of money to be reserved as a reserved portion at the first entity, at a controller separate from said first entity and at least one user device. The method further includes controlling at said controller an allocation of said reserved portion between a plurality of services to be accessed in a session after the requesting to the first entity.

Claim 74 recites a computer program, embodied on a computer readable medium, for controlling a processor to implement a method. The method includes requesting a reservation of a portion of an amount of money defined for at least one user device by stored information. The method further includes receiving, at a controller configured to allocate a reserved portion between a plurality of services to be accessed simultaneously, information defining an amount of said reserved portion in a first form other than a monetary amount. The method further includes converting information relating to said amount of said portion to a second form as a monetary amount, and then allocating said reserved portion between said plurality of services.

Thus, according to embodiments of the invention, credit control is established in a prepaid environment for services such as data access services with optimized communication. Therefore, real time credit control for data access services is realized in a more granular manner.

Pincus fails to disclose or suggest all of the elements of the claims, and therefore fails to provide the advantages and features discussed above.

Pincus generally discloses a computerized balance management system which includes a balance manager that maintains a database having pre-paid accounts. The accounts have data such as an account balance and other account configuration data. The system also communications with a plurality of servers that are coupled to a mobile network. The balance manger is configured to perform the tasks of receiving queries from at least one of the plurality of servers, calculating a reservation amount based on the query, and reserving the reservation amount against the pre-paid account. (see Pincus at Abstract).

Applicants respectfully submit that Pincus fails to disclose, teach, or suggest, all of the elements of the present claims. For example, Pincus fails to disclose, teach, or suggest, at least, *“a controller configured to control an allocation of said reserved portion between a plurality of services to be accessed by said at least one user device in a session,”* as recited in independent claim 1, and similarly recited in independent claims 21, 35, 71, and 73; *“and then allocating said reserved portion between said plurality of services,”* as recited in independent claim 37, and similarly recited in independent claims

72 and 74; “*a receiver configured to receive from said first entity information defining an amount of said reserved portion in a first form other than a monetary amount,*” as recited in independent claim 21, and similarly recited in independent claims 37, 72, and 74; and “*a converter configured to convert information relating to said amount of said reserved portion to a second form as a monetary amount,*” as recited in independent claim 21, and similarly recited in independent claims 37, 72 and 74.

Regarding “*a controller configured to control an allocation of said reserved portion between a plurality of services to be accessed by said at least one user device in a session,*” as recited in independent claim 1, and similarly recited in independent claims 21, 35, 71, and 73, and “*and then allocating said reserved portion between said plurality of services,*” as recited in independent claim 37, and similarly recited in independent claims 72 and 74, Pincus fails to disclose or suggest controlling the allocation of a reserved portion between a plurality of services.

Pincus discloses a balance manager 102 which receives requests to authorize and apply charges against pre-paid services. (see Pincus at paragraph 0028). Pincus further discloses a method for reserving amounts against the pre-paid services. When the system receives a wireless event, the system reserves an amount against the pre-paid amount. After the amount to reserve has been determined, the system determines the number of service units (e.g. seconds, minutes, hours) that should be authorized. The duration is calculated according to the amount reserved against the account. (see Pincus at paragraphs 0048-0050).

Pincus fails to disclose, or suggest, allocating the reserved portion to a plurality of services. Instead, Pincus merely discloses reserving a portion of a pre-paid account for a service to leave funds for other services. While Pincus discloses reserving a portion, there is no disclosure as to how that portion is eventually allocated to the plurality of services. Instead, Pincus merely discloses that the system of Pincus determines a number of service units to authorize based on the reserved amount.

In contrast, according to embodiments of the invention, the step of reserving a portion of an amount of money is followed by the step of allocating the reserved portion between the plurality of services. For example, the specification discloses, in an exemplary embodiment of the invention, that after an amount is reserved for four services, the reserved amount is divided into four, so that each service is allocated €5. (see Specification at page 17, lines 9-20 (including corresponding figure)).

The Office Action took the position that the “reverse rating,” in Pincus, discloses the allocating the reserved portion between the plurality of services. (see Office Action at page 3). However, as the disclosure of Pincus makes clear, the “reverse rating,” is an example of the reserving, not the allocation. Specifically, Pincus discloses that “[i]n one embodiment of the invention [of Pincus], reverse rating is used to reserve amounts against a pre-paid account.” (see Pincus at paragraph 0037).

The Office Action further took the position that Pincus discloses in paragraph 0106 that a user with a pre-paid account that desires to make voice calls while simultaneously accessing a content server can do so without worrying that the entire pre-

paid account will be allocated to one service thereby resulting in the denial of the other service. (see Office Action at page 3). However, paragraph 0106 discloses the advantages of the system of Pincus, and specifically discloses that an advantage of the reservation process disclosed in Pincus is that the entire pre-paid account will not be allocated to a particular service, because the system has reserved a predefined amount. However, paragraph 0106 fails to disclose how the amount is allocated. Thus, Pincus fails to disclose, or suggest, allocating a reserved portion between a plurality of services.

Regarding “*a receiver configured to receive from said first entity information defining an amount of said reserved portion in a first form other than a monetary amount,*” as recited in independent claim 21, and similarly recited in independent claims 37, 72, and 74, Pincus fails to disclose, or suggest, receiving from another entity information defining an amount of a reserved portion. The Office Action took the position that paragraph 0075 of Pincus discloses this limitation. (see Office Action at page 7). However, paragraph 0075 merely discloses that discounts are calculated and applied to the reservation amount determined, and discloses that this discount can be stored in database 104. (see Pincus at paragraph 0075). This does not disclose the above limitation for at least two reasons. First, determining a discount of a reservation amount does not disclose, or suggest, receiving from another entity information defining an amount of a reserved portion. Second, independent claim 21 clearly recites that the entity which is configured to request reservation of a portion, is also the entity which is configured to receive information defining an amount of the reserved portion from

another entity. The other independent claims recite similar limitations. Pincus clearly does not disclose an entity that both reserves a portion, and receives information defining another entity's reserved amount.

Finally, regarding “*a converter configured to convert information relating to said amount of said reserved portion to a second form as a monetary amount,*” as recited in independent claim 21, and similarly recited in independent claims 37, 72, and 74, Pincus fails to disclose, or suggest, converting non-monetary information relating to a reserved amount into a monetary amount. Instead, Pincus describes the exact opposite. Specifically, Pincus discloses that upon receiving a type of event, and a monetary amount, the system provides a corresponding quantity of service units that are authorized for that event, for example, quantify of time, bytes, messages, or tokens. (see Pincus at paragraph 0047). Thus, Pincus discloses converting a monetary amount into non-monetary information, as opposed to the reverse.

Therefore, for at least the reasons discussed above, Pincus fails to disclose, teach, or suggest, all of the elements of independent claims 1, 21, 35, 37, and 71-74. For the reasons stated above, Applicants respectfully request that this rejection be withdrawn.

Claims 2, 4-5, 7-12, 14-18, and 20 depend upon independent claim 1. Claims 24-25, 28-29, and 32-34 depend upon independent claim 21. Claims 47-66 depend upon independent claim 35. Claims 67-70 depend upon independent claim 37. Thus, Applicants respectfully submit that claims 2, 4-5, 7-12, 14-18, 20, 24-25, 28-29, 32-34,

47066, and 67-70 should be allowed for at least their dependence upon independent claims 1, 21, 35, and 37, and for the specific elements recited therein.

The Office Action rejected claims 3 and 6 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Pincus, in view of Masuda (U.S. Publication No. 2003/0078031) (“Masuda”). The Office Action took the position that Pincus discloses all the elements of the claims with the exception of “wherein the controller is further configured to divide said reserved portion [equally],” and “wherein the controller is further configured to allocate said reserved portion [dynamically],” with respect to claims 3 and 6. The Office Action then cited Masuda as allegedly curing the deficiencies of Pincus. (see Office Action at pages 10 and 11). The rejection is respectfully traversed for at least the following reasons.

The description of Pincus, as described above, is incorporated herein. Masuda discloses a communication system capable of conducting multi prepaid service. A service request transmitting section transmits a service request for a prepaid service, and a prepaid service executing section executes the prepaid service. A registration information transmitting section transmits registration information for executing the prepaid service. A user request receiving section receives the service request and the registration information. Based on the service request and the registration information, a prepayment control section performs prepayment control including a process of allotting the balance of prepayment to a plurality of prepaid services simultaneously.

Claims 3 and 6 depend upon independent claim 1. As discussed above, Pincus does not disclose, teach, or suggest all of the elements of independent claim 1. Furthermore, Masuda does not cure the deficiencies in Pincus, as Masuda also does not disclose, teach, or suggest, at least, “*a controller configured to control an allocation of said reserved portion between a plurality of services to be accessed by said at least one user device in a session,*” as recited in independent claim 1. Thus, the combination of Pincus and Masuda does not disclose, teach, or suggest all of the elements of claims 3 and 6. Additionally, claims 3 and 6 should be allowed for at least their dependence upon independent claim 1, and for the specific elements recited therein.

The Office Action rejected claim 31 under rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Pincus, in view of Ramakrishnan et al., (U.S. Patent Publication No. 2004/0148384) (“Ramakrishnan”). The Office Action took the position that Pincus discloses all the elements of the claims with the exception of “wherein said controller operates in accordance with a remote authentication dial-in user service (RADIUS) protocol.” The Office Action then cited Ramakrishnan as allegedly curing the deficiencies of Pincus. (see Office Action at page 11). The rejection is respectfully traversed for at least the following reasons.

The description of Pincus, as described above, is incorporated herein. Ramakrishnan generally disclose a method and system for enabling telecommunication network operators to transparently intermediate IP data flow, by providing a providing a

data classification method for implementing policy based filtering, forwarding, accounting, and/or monitoring of informational packets of interest.

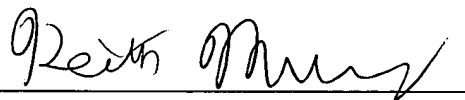
Claim 31 depends upon independent claim 21. As discussed above, Pincus does not disclose, teach, or suggest all of the elements of independent claim 21. Furthermore, Ramakrishnan does not cure the deficiencies in Pincus as Ramakrishnan also does not disclose, teach, or suggest, at least, “*a controller configured to control an allocation of said reserved portion between a plurality of services to be accessed by said at least one user device in a session,*” as recited in independent claim 21; “*a receiver configured to receive from said first entity information defining an amount of said reserved portion in a first form other than a monetary amount,*” as recited in independent claim 21; and “*a converter configured to convert information relating to said amount of said reserved portion to a second form as a monetary amount,*” as recited in independent claim 21. Thus, the combination of Pincus and Ramakrishnan does not disclose, teach, or suggest all of the elements of claim 31. Additionally, claim 31 should be allowed for at least its dependence upon independent claim 21, and for the specific elements recited therein.

For at least the reasons discussed above, Applicants respectfully submit that the cited prior art references fail to disclose or suggest all of the elements of the claimed invention. These distinctions are more than sufficient to render the claimed invention unanticipated and unobvious. It is therefore respectfully requested that all of claims 1-12, 14-18, 20-21, 24-25, 28-29, 31-35, 37, and 47-74 be allowed, and this application passed to issue.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the applicants' undersigned attorney at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, the applicants respectfully petition for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,


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Enclosures: Additional Claim Fee Transmittal
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